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**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE  
STATE OF CALIFORNIA**

<b>Application of Pacific Gas &amp; Electric Company to Revise its Electric Marginal Costs, Revenue Allocation and Rate Design (U39M).</b>	<b>A. 16-06-013</b>
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**PREHEARING CONFERENCE STATEMENT OF THE  
WESTERN MANUFACTURED HOUSING COMMUNITIES ASSOCIATION**

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**Counsel for the Western Manufactured  
Housing Community Association**

**September 9, 2016**

Pursuant to the Administrative Law Judge Ruling of September 1, 2016, the Western Manufactured Housing Community Association (WMA) hereby submits this Prehearing Conference Statement.

WMA has been involved, either actively or as a settlement party in most of the past PG&E GRC Phase II proceedings in the last 20 years. Most recently, WMA participated in a settlement that proposed a discount of \$0.18004 per space/per day, which was adopted by the Commission in Decision 15-08-005. The discount proposed by PG&E in this proceeding lowers the discount, quite dramatically, to \$0.04892 per space/per day.

From what WMA can determine, this lowering is through a reduction in the base discount of 40%, which is contradictory to PG&E's claim in this proceeding that it is making no adjustments to the underlying costs in rates. WMA is in the process of obtaining the underlying workpapers to determine the reasons for such a drastic change from the last general rate case. WMA will note, however, that the Diversity Benefit Adjustment appears to be reduced.

WMA also intends to explore the separate study on fixed costs for residential customers in which PG&E claims have increased a substantial amount. WMA intends to be closely involved in this to determine how much of the MHP costs are tied to PG&E's fixed costs.

Dated: September 9, 2016

Respectfully submitted,

/s/

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